

TSD RCRA Inspection Report

EPA Identification Number: 1 ND 009549598
 Installation Name: Johnson Controls
 Location Address: 1302 E. Monroe St.
 City: Goshen ZIP 46526
 Date of Inspection: 10-21-86 Time of Inspection 1:00PM - 4:35PM

Person(s) interviewed *	Title	Telephone
<u>John Fecteau</u>	<u>Safety & Environmental Control Admin.</u>	<u>219/533-2111</u>

Inspector(s)	Agency	Telephone
<u>Jeff Blankenberger</u>	<u>IDEM/OSHM</u>	<u>219/232-4536</u>

* Please identify correspondence contact

EPA Region 5 Records Ctr.



305952

Installation Processes by Process Code (EPA Form 3510-3)

S01 <input checked="" type="checkbox"/> Container storage	S02 <input type="checkbox"/> Tank storage
S03 <input type="checkbox"/> Waste Pile storage	S04 <input type="checkbox"/> Surface impoundment storage
D79 <input type="checkbox"/> Injection well disposal	D80 <input type="checkbox"/> Landfill disposal
D81 <input type="checkbox"/> Land Application disposal	D83 <input type="checkbox"/> Surface Impoundment disposal
T01 <input type="checkbox"/> Tank Treatment	T02 <input type="checkbox"/> Surface Impoundment treatment
T03 <input type="checkbox"/> Incinerator treatment	T04 <input type="checkbox"/> Other

If Part A process codes are listed above as T04 please describe the process involved below.

Other activities

Generator ☒

Appendix GN

Transporter ☐

Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

1. Verify EPA I.D. No. _____
2. Type of Facility (G, T, TSD) based on inspection G/TSD
3. Type of Operation, Products Manufactured, Processes Utilized,
Size of Operation. Concentrate on processes that produce waste
(hazardous or non-hazardous)!

see trip report

4. Hazardous Waste

<u>Streams/EPA #</u>	<u>Source</u>	<u>Rate</u>	<u>Disposition</u>
<u>Wastewater treatment ludge (F006)</u>	<u>plating</u>	<u>20-55gal/drum</u>	<u>2 months - Ashland</u>
<u>Waste Feen F002</u>	<u>degreasing</u>	<u>2-55gal drum/month</u>	<u>Safety Kleen</u>
<u>Waste 111 trichloro ethane F002</u>	<u>"</u>	<u>3-55gal drum/month</u>	<u>"</u>
<u>Waste trichloro ethylene F002</u>	<u>"</u>	<u>4-55gal/drum mo.</u>	<u>"</u>
<u>Waste MER F005</u>	<u>paint cleanups</u>	<u>3-55gal drums mo.</u>	<u>"</u>
<u>Waste (F001) Methylene Chloride</u>	<u>stripping</u>	<u>?</u>	
<u>Waste (F001) Blue solvent</u>	<u>cleanups</u>		
	<u>glue</u>		

5. Exempted/Excluded Hazardous Waste Streams and Reason for Exemption

12. Note any non-RCRA Violations (Open Dumping, Dumping in City Sewer Without Pretreatment Program, OSHA, etc.) _____

13. Additional Comments

- c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c) (320 IAC 4.1-16-4)

___ NI ___

3) Owner or Operator Inspections:

- a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?
40 CFR 265.15(a) (320 IAC 4.1-16-6)
- b. Does the owner or operator have an inspection schedule at the facility?
40 CFR 265.15(b)2 (320 IAC 4.1-16-6)
- c. If so, does the schedule address the inspection of the following items:
40 CFR 265.15(b)1 (320 IAC 4.1-16-6)
- i. monitoring equipment?
- ii. safety and emergency equipment?
- iii. security devices (including fences)?
- iv. operating and structural equipment (ie. dikes, pumps, etc.)?
- v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)?
40 CFR 265.15(b)(2) (320 IAC 4.1-16-6)
- vi. inspection frequency (based upon the possible deterioration rate of the equipment)?
40 CFR 265.15(b)(4) (320 IAC 4.1-16-6)

___ ✓ ___

___ ✓ ___

___ NI ___ Note

___ ✓ ___

___ ✓ ___

___ ✓ ___

___ ✓ ___

c.ii must include eye wash, showers, air packs on schedule

YES NO NI

4) Do personnel training records include:

- a. Job titles for the positions related to HWM
40 CFR 265.16(d)1 (320 IAC 4.1-16-7) ✓
- b. The name of the employees filling each job title?
40 CFR 265.16(d)(1) (320 IAC 4.1-16-7) ✓
- c. Job descriptions including the required skills, education, or other qualifications and the duties of the personnel assigned to the position?
40 CFR 265.16(d)2 (320 IAC 4.1-16-7) ✓
- d. Description of both introductory and continuing training required for each job?
40 CFR 265.16(d)(3) (320 IAC 4.1-16-7) ✓
- e. Records of training required in (d)?
40 CFR 265.16(d)4 (320 IAC 4.1-16-7) ✓
- f. Did facility personnel receive the required training including:
- i) classroom or on the job ✓
- ii) within 6 months of hire ✓
- iii) annual review of training? ✓
- g. Are all training records maintained for current personnel and for at least three years for former employees?
40 CFR 265.16(e) [320 IAC 4.1-16-7(e)] ✓

4 a)+c) No job title or job description
for waste handlers at generation point.

4 g) No training for all personnel
since Mar. 1985

Preparedness and Prevention

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

40 CFR 265.37 (320 IAC 4.1-17-7)

✓

- 2) Are copies of the Contingency Plan available at the site and local emergency organizations?

40 CFR 265.53 (320 IAC 4.1-18-4)

✓

- 3) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56 (320 IAC 4.1-18-7)?

✓

3) spill of 111, trichloroethane did
not file incident report within
15 days.

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

- 4) Use of Manifest System:

a. Does the facility follow the procedures listed in 265.71 (4.1-19-2) for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

NA

b. Are records of past shipments retained for 3 years?
40 CFR 265.71(b)5 (320 IAC 4.1-19-2)

✓

- 5) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only)

40 CFR 265.72 (320 IAC 4.1-19-3)

YES NO NI

4) Unmanifested Waste Reports:

(applies only to Off-site facilities)

- a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 (4.1-8-1) without a manifest or shipping paper?
40 CFR 265.76 (320 IAC 4.1-19-7) ✓
- b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type and date received for each unmanifested hazardous waste shipment.
- c. Has the facility submitted 8700-13B (unmanifested waste report)?
- _____
- _____
- _____

6) Closure/Post-Closure:

- a. Is the closure plan available for inspection?
40 CFR 265.112(a) (320 IAC 4.1-21-3) ✓
- b. Is the post-closure plan available for inspection?
(for disposal facilities only)
40 CFR 265.118(a) (320 IAC 4.1-21-8) NA
- _____
- _____
- _____

- 3) Whenever waste is being handled do all personnel have immediate access to an alarm or communication device (thru another employee if always available)?
40 CFR 265.34(a) (320 IAC 4.1-17-5)

YES	NO	NI
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- 4) Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33 (320 IAC 4.1-17-4)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------

- b. Is emergency equipment maintained in operable condition?
40 CFR 265.33 (320 IAC 4.1-17-4)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------

- 5) Does the owner or operator maintain adequate aisle space for inspections, movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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40 CFR 265.35 (320 IAC 4.1-17-6)

Tanks

40 CFR 265 Subpart J

YES NO NI

- 1) Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?

NA

40 CFR 265.192(b) (320 IAC 4.1-24-2)

- 2) Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?

40 CFR 265.192(c) (320 IAC 4.1-24-2)

- 3) Do continuous feed systems have a waste-feed cut-off?

40 CFR 265.192(d) (320 IAC 4.1-24-2)

- 4) Are reactive & ignitable wastes in tanks protected or rendered nonreactive or non-ignitable?

Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)

40 CFR 265.198 (320 IAC 4.1-24-6)

- 5) Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

40 CFR 265.198(b) (320 IAC 4.1-24-6)

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code -1977" to determine compliance.)

- 6) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?

40 CFR 265.17(a) (320 IAC 4.1-16-8)

a. Special handling?

b. No Smoking signs?

c. Separation and protection from ignition sources?

GROUNDWATER MONITORING

40 CFR Subpart F

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|---|------------|-----------|-----------|
| 1) Has the owner or operator of the facility implemented a groundwater monitoring system?
<u>40 CFR 265.90(a) (320 IAC 4.1-20-1)</u> | ___ | ___ | ___ |
| 2) Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in <u>265.90(d) (320 IAC 4.1-20-1)</u> ?
<div style="margin-left: 350px;"><i>NA</i></div> | ___ | ___ | ___ |
-
-
-

YES NO NI

4) Reportable exceptions:

40 CFR 262.42 (320 IAC 4.1-10-3)

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. - 0 -

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) (320 IAC 4.1-10-3) to the Regional Administrator.

- 0 -

5) If required, are placards available to transporters of hazardous waste?

40 CFR 262.33 (320 IAC 4.1-9-4)

NA

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? ✓

40 CFR 262.50 (320 IAC 4.1-11-1)

(If answered Yes, complete the following as applicable.)

a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing hazardous waste; has the generator met the manifest requirements?

YES NO NI

RECORDKEEPING AND REPORTING:

- | | | | |
|--|-------------------------------------|--------------------------|--------------------------|
| 1) Has the generator made a proper hazardous waste determination for all solid wastes generated at the facility?
<u>40 CFR 262.11 (320 IAC 4.1-7-2)</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2) Have <u>all</u> all test results and analyses needed for hazardous waste determination been done? Are they retained on-site for at least three years?
<u>40 CFR 262.11 (4.1-7-2) & 40 CFR 262.40 (4.1-7-2)</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3) Has the generator submitted biennial reports and exception reports as required?
<u>320 IAC 4.1-10-2 and 320 IAC 4.1-10-3</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?
<u>40 CFR 262.40 (320 IAC 4.1-10-1)</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <hr/> | | | |
| <hr/> | | | |
| <hr/> | | | |

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

see part "A"

Remember to take photos and document as well as possible all violations!!!

PRE-INSPECTION CHECKLIST

DATE: 1-9-85

Company: Johnson Controls (TSD) (G) T
 Location: 1302 Monroe Goshen
 EPA ID Number: IND 009549593
 Type of Industry: Environmental Control devices
 Inspector(s): Jeff Blankenbeger

YES NO

1. Federal Part A on File: ☒ YES ☐ NO
 2. State Part A on File: ☒ YES ☐ NO
 3. Closure Plan Reviewed: ☒ YES ☐ NO
 4. Contingency Plan Reviewed: ☒ YES ☐ NO *Not Adequate*
 5. Waste Analysis Plan Reviewed: ☐ YES ☒ NO
 6. Annual Report Reviewed: ☒ YES ☐ NO
 7. Federal and State Part A Compared: ☒ YES ☐ NO
- Note any differences. (Difference should be resolved during inspection.)

8. Date of Last Inspection: NONE
9. Enforcement Action Taken in Past: ☐ YES ☒ NO
10. List Type of Action and Major Violations: ☐ YES ☐ NO

11. Approval Letters for Landfilling ALL Waste Reviewed: ☒ YES ☐ NO
 List Waste, Amount, and Landfill Approved:
Zinc, cadmium, tin plating sludge
to Four County Landfill.

12. NPDES Permit: ☒ YES ☐ NO
13. Part A Allowed Quantity of Waste

S01 1,550 G

S02 1,100 G

T04 35,000 G per day

14. Part A Hazardous Waste Codes and Names:

F001 13,000 P S01

F002 21,800 P S01

F003 3,625 P S02

F005 18,810 P S02

F006 12,350 P S02

15. List Possible Waste Streams Not Listed on Part A:

TSD RCRA Inspection Report

EPA Identification Number: 1 N D 0 0 9 5 4 9 5 9 3

Installation Name: Johnson Controls

Location Address: 1302 ~~W~~ Monroe St

City: Goshen ZIP 46526

Date of Inspection: 1-10-85 Time of Inspection 12:30 to 4:30 PM

Person(s) interviewed

Title

Telephone

Stanley Leedy

Supervisor Manf. Engineering (219) 533-2111 ext 238

John Fecteau

Industrial Engineer

" " " ext 367

Inspector(s)

Agency

Telephone

Jeff Blankenberger

15BH/LPC

Installation Processes by Process Code (EPA Form 3510-3)

- S01 ☒ Container (barrel, drum, etc.)
S02 ☐ Tanks
S04 ☐ Surface impoundment
D84 ☐ Surface impoundment closed as a landfill
S03 ☐ Waste Pile
D81 ☐ Landfill
D80 ☐ Underground injection

If Part A process codes are not listed above please check 40 CFR 265 Appendix I, Table 2 for correct code number. List codes below.

Other activities

Generator ☒

Appendix GN

Transporter ☐

Appendix TR

1. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
2. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

General Facility Standards (paperwork)

YES NO NI

1) Has the Regional Administrator/Environmental Management Board been notified regarding:

- a. Receipt of hazardous waste from a foreign source?
40 CFR 265.12(a)
- b. Facility expansion?
40 CFR 122.23(c)
- c. Change of owner or operator?
40 CFR 265.12(b)

NA
— — —
— — —
— — —

2) General Waste Analysis:

- a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
40 CFR 265.13(a)1
- b. Does the owner or operator have a detailed waste analysis plan on file at the facility?
40 CFR 265.13(b)

✓ ✓ —
— ✓ —

Does the waste analysis plan contain:

- 1. parameters
- 2. test methods
- 3. sampling method for representative sample
- 4. frequency of analysis
- 5. for off-site facilities: waste analysis from generators
- 6. Where applicable (additional waste analysis needed)
 - a. 265.193 When chemically or treating different waste or using a different process or storing waste in different type of containers.
 - b. 265.225 Surface impoundment
(same as above)
 - c. 265.252 Waste Pile
(same as above)
 - d. 265.273 Land Treatment Facility
(same as above)
 - e. 265.341 Incinerators
(same as above)
 - f. 265.375 Thermal Treatment
(same as above)
 - g. 265.402 Chemical, Physical, Biological Treatment
(same as above)

2)b. plan does not contain parameters, test methods,
and frequency of analysis

2)a Do not have Analysis of paint filters from spray
booths

YES NO NI

- c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?
40 CFR 265.13(c)

NA

receive no waste from off site

3) Owner or Operator Inspections:

- a. Does the owner or operator inspect the facility for deterioration, malfunctions, operator errors, and discharges of hazardous waste that may affect human health or the environment?

40 CFR 265.15(a)

✓

- b. Does the owner or operator have an inspection schedule at the facility?

40 CFR 265.15(b)2

✓ note

- c. If storage in tanks or containers is used does the inspection schedule require a weekly inspection?

40 CFR 265.194 tanks, 265.174 containers, 265.226(a)2 impoundments

✓

a. inspections not made since Aug, 1983

b. for drum storage area only

	<u>YES</u>	<u>NO</u>	<u>NI</u>
d. If so, does the schedule address the inspection of the following items: <u>40 CFR 265.15(b)1</u>			
i. monitoring equipment?		<u>NA</u>	
ii. safety and emergency equipment?		<u>✓</u>	
iii. security devices (including fences)?		<u>✓</u>	
iv. operating and structural equipment (ie. dikes, pumps, etc.)?		<u>NA</u>	
v. type of problems to be looked for during the inspection (e.g. leaky fittings, defective pump, etc.)? <u>40 CFR 265.15(b)(2)</u>	<u>✓</u>		
vi. inspection frequency (based upon the possible deterioration rate of the equipment)? <u>40 CFR 265.15(b)(4)</u>	<u>✓</u>		
vii. <u>Must include:</u>			
1. Weekly container storage? <u>265.174</u>	<u>✓</u>		
2. Daily and Weekly Tank Storage? <u>265.194</u>		<u>NA</u>	
3. Daily freeboard and weekly dike inspection for surface impoundments? <u>265.226</u>		<u>NA</u>	
4. Landfills, Thermal treatment, Chemical, Physical, and Biological treatment should be inspected as determined by deterioration rate and daily at loading and unloading areas (where spills are likely) <u>265.15(b)(4)</u>		<u>NA</u>	
e. Are areas subject to spills inspected daily when in use? <u>265.15(b)(4)</u>		<u>✓</u>	

d.) Do not have inspection schedule for safety and emergency equipment or security devices

- | | YES | NO | NI |
|---|-----|-------------------------------------|----|
| f. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
40 CFR 265.15(d) | — | <input checked="" type="checkbox"/> | — |
| g. Does the inspection log contain the following information:
40 CFR 265.15(d) | | | |
| i. the date and time of the inspection? | — | — | — |
| ii. the name of the inspector? | — | — | — |
| iii. a notation of the observations made? | — | — | — |
| iv. the date and nature of any repairs or remedial actions? | — | <input checked="" type="checkbox"/> | — |

f. No inspections or logs since Aug, 1983

4) Do personnel training records include:

- | | | | |
|---|-------------------------------------|---|---|
| a. Are all facility personnel included in the records?
40 CFR 265.16(a)(1) | <input checked="" type="checkbox"/> | — | — |
| b. Job titles?
40 CFR 265.16(d)1 | <input checked="" type="checkbox"/> | — | — |
| c. Job descriptions?
40 CFR 265.16(d)2 | <input checked="" type="checkbox"/> | — | — |
| d. Description of training?
40 CFR 264.16(d)3 | <input checked="" type="checkbox"/> | — | — |
| e. Records of training?
40 CFR 265.16(d)4 | <input checked="" type="checkbox"/> | — | — |
| f. Did facility personnel receive the required training including: | | | |
| i) classroom or on the job | <input checked="" type="checkbox"/> | — | — |
| ii) within 6 months of hire | <input checked="" type="checkbox"/> | — | — |
| iii) annual review of training? | <input checked="" type="checkbox"/> | — | — |

Preparedness and Prevention

YES NO NI

- 1) Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

40 CFR 265.37

— ☒ —

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

- 1) Does the Contingency Plan contain the following information:

a. The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan; he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).

— ☒ —

b. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 265.37?

— ☒ —

c. Names, addresses, and phone numbers of all persons qualified to act as emergency coordinators?

☒ — —

- 2) Emergency Coordinator:

a. Is the facility Emergency Coordinator identified?
40 CFR 265.52(d)

☒ — —

b. Is coordinator familiar with all aspects of site operation and emergency procedures?
40 CFR 265.55

☒ — —

c. Does Emergency Coordinator have the authority to carry out the Contingency Plan?
40 CFR 265.55

☒ — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
40 CFR 265.52(e)

— ☒ —

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)
40 CFR 265.52(f)

☒ — —

1. a) plan does not address explosions

1. b) No arrangements with local authorities

2. d) plan does not include list of emergency equip.

YES NO NI

- 3) Are copies of the Contingency Plan available at the site and local emergency organizations?
40 CFR 265.53

— ☒ —

Not available at local emergency organizations

- 4) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

— NA —

No emergency have occurred

MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING:

- 1) Use of Manifest System:

a. Does the facility follow the procedures listed in 265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)

— NA —

b. Are records of past shipments retained for 3 years?
40 CFR 265.71(b)5

☒ — —

- 2) Does the owner or operator meet requirements regarding manifest discrepancies? (Off-site facilities only)
40 CFR 265.73(a)

— NA —

No waste from off site

3) Operating Record:

YES NO NI

- a. Does the owner or operator maintain an operating record as required in 265.73? ✓ — —
- b. Does the operating record contain the following information:
- i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR 265 Appendix I? 40 CFR 265.73(b)(1) ✓ — —
- ii. The location and quantity of each hazardous waste within the facility? (This information should be cross referenced to specific manifest number if the waste was accompanied by manifest.) 40 CFR 265.73(b)(2) — NA —
- iii. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross referenced to specific manifest number, if accompanied by a manifest.) 40 CFR 265.73(b)(2) — NA —
- iv. Records and results of all waste analyses, trial tests, monitoring data, and operating inspections? 40 CFR 265.73(b)(3)(5)(6) ✓ — —
- v. Reports detailing all incidents that required implementation of the Contingency Plan? 40 CFR 265.73(b)(4) — NA —
- vi. All closure and post closure costs as applicable? 40 CFR 265.73(b)(7) ✓ — —

3.6 ii does not contain information on disposal (date)

3.6 ii not cross-referenced with manifest document #

PHYSICAL FACILITY INSPECTION

- 1) Security - Do security measures include:
(If applicable)

See 40 CFR 265.14 for the following

	<u>YES</u>	<u>NO</u>	<u>NI</u>
a. 24- hour surveillance? or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. i. Artificial or natural barrier around facility? and	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. Controlled entry?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Danger sign(s) at entrance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

C. No ~~any~~ sign at entrance to container storage building

Preparedness and Prevention:

Part 265 Subpart C

- 1) Maintenance and Operation of Facility

a. Is there any evidence of fire, explosion, or release
of hazardous waste or hazardous waste constituent?
40 CFR 265.31

☐ ☒ ☐

- 2) If required, does the facility have
the following equipment:

a. Internal communications or alarm systems?
40 CFR 265.34(a) & 40 CFR 265.32(a)

☒ ☐ ☐

b. Telephone or 2-way radios at the scene of operations?
40 CFR 265.32(b) & 40 CFR 265.34(b)

☒ ☐ ☐

c. Portable fire extinguishers, fire control, spill
control equipment and decontamination equipment?
40 CFR 265.32(c)

☒ ☐ ☐

Indicate the volume of water and/or foam available for fire control:

City water supply

YES NO NI

3) Testing and Maintenance of Emergency Equipment:

- a. Has the owner or operator established testing and maintenance procedures for emergency equipment?
40 CFR 265.33

☒ ☐ ☐

- b. Is emergency equipment maintained in operable condition?
40 CFR 265.33

☒ ☐ ☐

- 4) Has owner or operator provided immediate access to internal alarms? (If needed)
40 CFR 265.34(a)

☒ ☐ ☐

- 5) Does the owner or operator maintain adequate aisle space for movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment? (This applies to access for this equipment to reach hazardous waste management areas)
40 CFR 265.35

☒ ☐ ☐

Use and Management of Containers

40 CFR 265 Subpart I

	<u>YES</u>	<u>NO</u>	<u>NI</u>
1) Are containers in good condition? <u>40 CFR 265.170</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Are containers compatible with waste in them? <u>40 CFR 265.172</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Are containers managed to prevent leaks? <u>40 CFR 265.173(b)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Are containers stored closed? <u>40 CFR 265.173(d)</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the property line? (Indicate if waste is ignitable or reactive). <u>40 CFR 265.176</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6) Are incompatible wastes stored in separate containers? (If not the provisions of 265.17(b) apply) <u>40 CFR 265.177(a)</u>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
7) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? <u>40 CFR 265.177(c)</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? <u>40 CFR 265.17(a)</u>			
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. No Smoking signs?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9) Is there adequate aisle space for unobstructed movement? <u>40 CFR 265.35</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

8b. Need "no smoking" sign at entrance to container
storage building.

9. No aisle space in drum storage building, 93 drums stored
tightly together

APPENDIX GN

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements:

YES NO NI

- 1) Does the operator have copies of the manifest available for review?

40 CFR 262.40

✓ — —

- 2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period

7

- 3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements).

40 CFR 262.21

a. Manifest document number?

✓ — —

b. Name, mailing address, telephone number, and EPA ID number of generator?

✓ — —

c. Name and EPA ID Number of Transporter(s)?

✓ — —

d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?

✓ — —

e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?

✓ — —

f. The total quantity of waste(s) and the type and number of containers loaded?

✓ — —

g. Required certification?

✓ — —

h. Required signatures?

✓ — —

YES NO NI

4) Reportable exceptions:

40 CFR 262.42

a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. - 0 -

b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. - 0 -

5) If required, are placards available to transporters of hazardous waste? ✓

40 CFR 262.33

5) Placards are not available

INTERNATIONAL SHIPMENTS:

1) Has the installation imported or exported hazardous waste? ✓

40 CFR 262.50

(If answered Yes, complete the following as applicable.)

a. Exporting hazardous waste; has a generator:

i. Notified the administrator in writing?

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing hazardous waste; has the generator met the manifest requirements?

PRE-TRANSPORT REQUIREMENTS:

- | | <u>YES</u> | <u>NO</u> | <u>NI</u> |
|---|-------------------------------------|--------------------------|--------------------------|
| 1) Is waste packaged in accordance with DOT regulations?
(required prior to movement of hazardous waste off-site)
<u>40 CFR 262.30</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2) Are waste packages marked and labeled in accordance with
DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site)
<u>40 CFR 262.31-261..32</u> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
-
-
-

3) On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this blank ☒ and skip to RECORDKEEPING AND REPORTING. If the installation elects option B, complete the following observations:

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| a. Is the container clearly marked with the start of accumulation date?
<u>40 CFR 262.34</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Are all containers visible for inspection?
<u>40 CFR 262.34(a)(2)</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Have more than 90 days elapsed since the date inspected in (a)?
<u>40 CFR 262.34</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Do wastes remain in accumulation tanks for more than 90 days?
<u>40 CFR 262.34</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
<u>40 CFR 262.34</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Is waste packaged in accordance with DOT regulations?
<u>320 IAC 4-4-1</u> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
-
-
-

YES NO NI

- g. Are waste packages marked in accordance with applicable DOT regulations on hazardous materials under 49 CFR Part 172?

320 IAC 4-4-1

— — —

- h. Are waste packages labeled in accordance with applicable DOT regulations on hazardous materials under 49 CFR Part 172?

320 IAC4-4-1

— — —

RECORDKEEPING AND REPORTING:

- 1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years?

40 CFR 262.40

✓
— — —

DRAW A SITE MAP; identify site of all hazardous waste activity, i.e. accumulation areas, storage areas, treatment areas, etc.

Remember to take photos and document as well as possible all violations!!!

Briefly Describe Site Activity

1-9-85

Johnson Controls manufacture and distribute automatic control devices. Principle processes are machining, stamping, molding, plating, and light assembly.

They generate the following hazards waste:

Waste water treatment Sludge (FOG) from tin, zinc, and cadmium plating, 16 drums on-site. Still bottoms from trichloroethylene degreasing, 9 drums on-site. Waste 1,1,1 trichloroethane from degreasing operations, 6 drums. Waste MEK from painting operations, 9 drums. Waste paint 6 drums. Methylene chloride from painting 25 drums. Still bottoms from Freon degreasing 3 drums. Dibromo ethyl Benzene from testing 3 drums. Ethyl Alcohol from cleaning, one drum on-site. These waste streams are stored on-site Prior to disposal

What is the status of the facility, if different from original notification, explain! (copy all pertinent documents)

offsite.

Plating Sludge is taken to either Four County Landfill, or to Ashland Chemical in South Bend. All solvent and paint wastes are taken to Reclaimed Energy or Waste Research and Reclamation in Eau Claire, Wis. None hazardous waste oils are taken by Goshen Iron and Metal for Reclamation.

No regulated treatment or disposal at site.